

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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<b>IN RE:</b>	:	
Lisa Francis	:	Chapter 13
	:	Case No. 20-12746-ELF
Debtor(s)	:	

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**RESPONSE TO THE MOTION FOR RELIEF OF AUTOMATIC STAY**  
**FILED BY LAKEVIEW LOAN SERVICING, LLC**

Debtor, Lisa Francis, by and through their undersigned Counsel, Brad J. Sadek, in response to the Motion for Relief filed by Lakeview Loan Servicing, LLC and hereby submits the following:

1. Admitted
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied. Debtor avers all payments were made to date.
7. Debtor opposes the same.
8. Denied. Debtor avers all payments were made to date.
9. Denied.
10. No response required.

WHEREFORE, based on the aforementioned, Debtor respectfully requests that Movant shall be denied an Order granting relief of the Automatic Stay pursuant to 11 U.S.C. § 362.

/s/ Brad J. Sadek, Esq.

Dated: July 14, 2022

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Brad J. Sadek, Esq.  
Attorney for the Debtor  
Sadek & Cooper  
1315 Walnut Street, #502  
Philadelphia, PA 19107  
(215) 545-0008

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**CERTIFICATE OF SERVICE**

I, Brad J. Sadek, Esq. certify that on the date indicated below served a true and correct copy of the Debtor's Response to the Motion for Relief from Automatic Stay by electronic or Regular U.S. Mail on all creditors and the following parties:

**Kenneth E. West, Esq.**  
Standing Chapter 13 Trustee  
Electronic Notice

**Rebecca A. Soalrz, Esq.**  
Attorney for Movant *Lakeview Loan Servicing, LLC*  
Electronic Notice to [bkgroup@kmlawgroup.com](mailto:bkgroup@kmlawgroup.com)

Dated: July 14, 2022

/s/Brad J. Sadek, Esq.  
Brad J. Sadek, Esq.  
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